

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

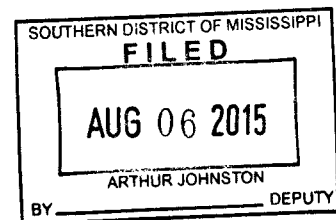
United States of America)

v.)

Jorge Felix-Ibarra)

Case No.)

3:15mj162-LRA)



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 20, 2012 in the county of Adams in the
Southern District of Mississippi, the defendant(s) violated:

Code Section

18 U.S.C. 1792

Offense Description

Instigating, conniving, willfully attempting to cause, assist, or conspiring to cause a riot at a Federal penal, detention, or correctional facility.

This criminal complaint is based on these facts:

See attached affidavit - "Exhibit A".

☒ Continued on the attached sheet.

Molly Motley Blythe, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

August 6, 2015
Judge's signature

City and state:

Jackson, Mississippi

Linda R. Anderson, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Molly Motley Blythe, Affiant, being duly sworn, hereby state and depose that I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since October of 2012. I am currently assigned to investigate public corruption matters for the Jackson, Mississippi, FBI Field Office. The below stated information is derived from my personal knowledge while being involved in this investigation and also from information provided to me by other FBI Agents involved in the investigation.

The Adams County Correctional Center (ACCC), 20 Hobo Fork Road, Natchez, Mississippi is owned and managed by Corrections Corporation of America (CCA). The facility is a federal penal facility operated by a private corporation under the direction and regulation of the Bureau of Prisons (BOP) and exclusively houses federal prisoners. ACCC houses approximately twenty-five hundred non-resident aliens who have been convicted of federal charges in the United States.

The majority of the inmate population consists of Mexican nationals known as Paisas. The Paisas wield the most power and influence among the prison population. Many within the inmate population had become disgruntled with the food, medical conditions and disrespectful staff members at ACCC. The Paisas felt their leadership was ineffective at communicating their grievances to prison officials since their complaints had gone unaddressed for so long.

On or about May 19, 2012, the leaders of the Paisas were ousted and replaced by inmates Ernesto "Neto" Granados and Juan "Bobby" Arredondo. Granados, Arredondo and a large group of Paisas planned to take a list of grievances to Warden Vance Laughlin on May 20, 2012. The Paisas also planned to take their old representatives to the Special Housing Unit (SHU) to be segregated from the general population. Granados and Arredondo instructed the Paisas to destroy the prison if Warden Laughlin chose to ignore their demands. In addition to destroying the prison, Paisas were planned to assault the correction officers (CO). The Paisas had created a list of several COs they no longer wanted working at ACCC. The list included CO Deborah Temple, CO Robert Scott and CO Corey Lofton.

On May 20, 2012, at approximately 1:30pm, several Paisas attempted to escort one of their old reps and a Canadian rep to the SHU. The COs noticed something was wrong and shut the internal gates along Main Street, which is the pathway that runs through the center of the facility. After the internal gates were closed, Granados, Arredondo and approximately two hundred Paisas went to Gate 117 along Main Street,

and demanded to speak to Warden Laughlin. Several COs locked themselves into safe zones located on Main Street.

Eventually, several COs were posted on the roof of the Echo housing unit and the roof of the H & J building. Both buildings overlook Gate 117. Chief of Security Dale London ordered the inmates at Gate 117 to step away from the gate and into the recreation yards along Main Street, but the inmates refused to comply. Inmates were later ordered over the prison's public announcement system to return to their housing units, but they refused to comply. Between 3:00pm and 3:30pm, the inmates began kicking and tearing at Gate 117. The inmates also tried to gain entry into a safe zone near Echo unit which contained three COs. The COs on the rooftops began deploying tear gas on the inmates gathered near Gate 117. Some inmates threw the gas canisters back at the guards, while others started throwing rocks and other items at the COs. Inmates began destroying fences along Main Street, concealing their faces and destroying cameras.

Several inmates tore through a fence enabling them to move undetected behind Echo and steal a 32 foot ladder. The inmates brought the ladder back to Main Street and utilized it to breach the rooftop of Echo. CO Corey Lofton and CO Peggy Stevens were both assaulted on the rooftop of Echo and taken to a recreation yard along Main Street where they were held hostage for several hours.

After the assaults on the roof of Echo, the inmates began bringing items out of the dining hall and kitchen, which are located in the H & J building. Inmates stacked food service carts on top of each other in front of H & J and began climbing towards the roof. Once the inmates were on the roof of H & J, they ran towards and came in contact with CO Catlin Carithers and CO Deborah Temple. The inmates on the roof assaulted CO Temple and CO Carithers. CO Carithers died as a result of the assault. CO Temple was struck repeatedly in the head, face and legs causing her to black out. When CO Temple regained consciousness, she had been stripped of her keys, handcuffs, radio and gas mask.

After the assaults on Echo and H & J, the inmates used the staff's keys to gain access to a safe zone along Main Street and assault CO Robert Scott, CO Rebecca Scott and CO Willie Cranfield. The inmates were also able to gain access to another safe zone and take CO Hunter Floyd, CO Kylie Winchester and CO Kenneth White hostage. Inmates then began looting kitchen and the prison commissary.

Eventually, the inmates were able to enter the housing units along Main Street by telling Warden Laughlin they just wanted to return to their cells and bunks. However, the inmates involved in the riot used this opportunity to take additional staff members hostage in the housing units. Several of the Paisas entered the housing units and forced other inmates to go outside and participate in the riot. Inmates entered the Zulu housing unit and attempted to gain access to several staff members who had secured themselves in the SHU. The Paisas tried to break into the SHU to free more of their members and to possibly assault some of their enemies who were housed in the SHU.

The inmates maintained control of the facility until approximately 7:00pm when members of the prison's Special Operations Response Team (SORT) and the Mississippi Highway Patrol (MHP) began to retake the facility. SORT and MHP advanced along Main Street firing tear gas and rubber bullets.

While SORT and MHP were securing the facility, several COs were being held hostage at Gate 117 by several inmates carrying weapons. The inmates forced three COs to get on their knees and they warned the staff members on the secure side of Gate 117 that they would kill the COs if the shooting did not stop. As the breach continued, the inmates grabbed the three COs and used them as human shields against the rubber bullets.

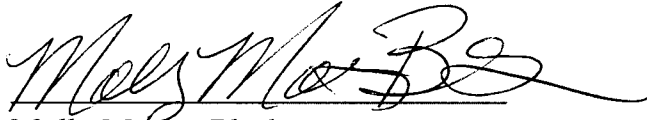
The inmates were pushed back by SORT and MHP to an open yard behind Sierra housing unit. All staff were accounted and the riot was over by 9:00pm. The total damage to ACCC is estimated to be \$1,305,142.00.

Jorge Felix-Ibarra has been identified as being one of the inmates who was an active participant in the riot. Felix-Ibarra was observed throwing items at the SORT teams as they attempted to gain control of the facility. Felix-Ibarra was shot in the eye with a bean bag while he was throwing items at the SORT team.

FBI Agents interviewed Felix-Ibarra and he acknowledged participating in the riot. Felix-Ibarra admitted to stealing several items from the prison's commissary and utilizing a set of keys to try and unlock one of the housing pods while the riot was in progress. Felix-Ibarra also acknowledged that he tried to prevent the SORT teams from advancing by pushing items in front of them.

According to the Bureau of Prisons, Felix-Ibarra is scheduled to be released from custody and turned over to Immigration and Customs Enforcement (ICE) to begin the deportation process on August 10, 2015.

Affiant believes that the facts presented in this affidavit are sufficient to establish probable cause to charge Jorge Felix-Ibarra with Title 18, United States Code (U.S.C.), Section 1792, by actively participating and assisting in a riot at a Federal correctional facility.

A handwritten signature in cursive script, appearing to read 'Molly Motley Blythe', written over a horizontal line.

Molly Motley Blythe
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 6th day of August, 2015

A handwritten signature in cursive script, appearing to read 'Rando R. Anderson', written over a horizontal line.

United States Magistrate Judge